

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN Re:

Lance Patrick Alexander and,  
Terri Ann Alexander  
Debtors,

Lance Patrick Alexander and,  
Terri Ann Alexander,  
Movants,

vs.

Ronda J. Winnecur Chapter 13  
Trustee,  
Respondent,

Case No. 17-21820-JAD

Chapter 13

Related to DD No. 184, 185  
Docket Document No. 186

**STATUS REPORT RE: CERTIFICATE OF DEFAULT**

AND NOW the Debtors Lance and Terri Alexander, through attorney David A. Coleechia, Esq., file the within Status Report concerning the Trustee's Certification of Default.

- 1) This Status Report relates to the Trustee's Certificate of Default filed at DD No. 184.
- 2) After discussion between Debtors and Counsel, the Debtors have determined that they are unable to file an Amended Plan or proposed Notice to Cure Plan Default.
- 3) The Debtors also cannot dispute the Plan is in default.
- 4) Instead, the Debtors will be filing a Motion for a Hardship Discharge later today.
- 5) However, since such a Motion is not one of the designated responses available for a default, the Debtors believed it prudent to file the within Status Report to alert the Court as to the current circumstances and inability to respond absent a Motion for Hardship Discharge, and to indicate the Debtors are not willfully ignoring this Court's Orders.

6) Counsel for the Debtor intends to file, self-schedule, and serve the Motion for Hardship Discharge later today.

WHEREFORE, the Debtors so Report.

Dated: May 11, 2023

By: /s/ David A. Colecchia  
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